

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: Docket No. 6**

**CERTIFICATION OF COUNSEL REGARDING INTERIM  
ORDER (A) AUTHORIZING, BUT NOT DIRECTING, THE DEBTORS TO  
(I) PAY PREPETITION WAGES AND COMPENSATION; (II) CONTINUE  
CERTAIN EMPLOYEE BENEFITS AND INCENTIVE PROGRAMS;  
(III) CONTINUE CERTAIN HEALTH AND INSURANCE BENEFITS;  
AND (B) GRANTING OTHER RELATED RELIEF**

The undersigned hereby certifies as follows:

1. On June 27, 2023, the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) filed the *Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing, the Debtors to (I) Pay Prepetition Wages and Compensation; (II) Continue Certain Employee Benefits and Incentive Programs; (III) Continue Certain Health and Insurance Benefits; and (B) Granting Other Related Relief* [Docket No. 6] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Attached thereto as **Exhibit A** was a proposed form of order granting the relief requested in the Motion on an interim basis (the “**Proposed Interim Order**”).

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

2. On June 28, 2023, the Court held an initial hearing (the “**First Day Hearing**”) in these chapter 11 cases. At the First Day Hearing, the Court indicated that it would approve the Proposed Interim Order, subject to certain revisions being made thereto.

3. Consistent with the record made at the First Day Hearing, the Debtors have prepared a revised Proposed Interim Order (the “**Revised Proposed Interim Order**”), and such Revised Proposed Interim Order is attached hereto as **Exhibit 1**. For the convenience of the Court and all parties in interest, a redline comparison of the Revised Proposed Interim Order marked against the Proposed Interim Order is attached hereto as **Exhibit 2**.

4. A copy of the Revised Proposed Interim Order has been circulated to the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”), and the U.S. Trustee does not object to the entry of the Revised Proposed Interim Order.

*[Remainder of page intentionally left blank]*

WHEREFORE, the Debtors respectfully request that the Revised Proposed Interim Order, substantially in the form attached hereto as **Exhibit 1**, be entered at the earliest convenience of the Court.

Dated: June 28, 2023

Respectfully submitted,

/s/Amanda R. Steele

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